



MURIEL GOODE-TRUFANT
Acting Corporation Counsel

THE CITY OF NEW YORK
LAW DEPARTMENT
100 CHURCH STREET
NEW YORK, NY 10007

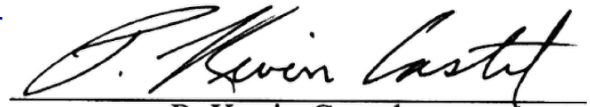
ELISSA JACOBS
Senior Counsel
Phone: (212) 356-3540
Fax: (212) 356-3509
Email: ejacobs@law.nyc.gov

October 4, 2024

Initial conference adjourned from October 21, 2024 to
November 22, 2024 at 11:30 a.m. Dial-In No.: 1-888-363-4749,
Access Code: 3667981.
SO ORDERED.
Dated: 10/7/2024

BY ECF

Honorable P. Kevin Castel
United States Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007


P. Kevin Castel
United States District Judge

Re: Garcia v. City of New York et al.
24-CV-6174 (PKC)

Your Honor:

I am a Senior Counsel in the Office of Muriel Goode-Trufant, Acting Corporation Counsel of the City of New York, and the attorney for Defendants City of New York, Joseph Paolini and Madelyn Ulerio in the above-referenced case.¹ I write on behalf of Defendants to respectfully request that the Court adjourn the Initial Conference currently scheduled for October 21, 2024, at 11:00 am. This is Defendants' first request for an adjournment. Plaintiff consents to the instant request.

By way of background, on July 18, 2023, Plaintiff filed the instant matter alleging, *inter alia*, denial of a right to a fair trial, malicious prosecution, false arrest, and excessive force, and various state law claims. See ECF No. 1. On September 11, 2024, the parties participated in a mediation conference which was unsuccessful. On October 2, 2024, Plaintiff requested an initial conference. See ECF No. 35. The Court granted Plaintiff's request on October 2, 2024 and scheduled an initial pretrial conference for October 21, 2024 at 11:00 am. See ECF No. 36. Prior to the conference, the parties were also ordered to confer and submit a Case Management Plan and Joint Letter pursuant to Your Honor's Individual Rules.

¹ This case has been assigned to Assistant Corporation Counsel Jessica Ochoa. Ms. Ochoa is a member in good standing with the New York State Bar (No. 6124655) as well as admitted to practice before the U.S. District Courts of the District of Columbia (No. 1736588) and Maryland (No. 30564). She is currently in the process of being admitted to practice before the present court. Ms. Ochoa may be reached directly at (212) 356-3159.

At this time, Defendants respectfully request an adjournment of the Initial Conference as Ms. Ochoa, to whom this matter is assigned, will be out of the office from October 7, 2024, through October 18, 2024, as she will be getting married. As such, counsel will be unavailable to confer with Plaintiff's counsel regarding the Case Management Plan and Joint Letter prior to the Initial Conference. Plaintiff is aware of counsel's schedule and the parties have conferred and propose the alternate date of November 4, 2024, or a date thereafter convenient to the Court.

Accordingly, Defendants respectfully request that the Court adjourn the Initial Conference on October 21, 2024, to November 4, 2024, as well as any relevant deadlines.

Defendants thank the Court for its time and consideration of these requests.

Respectfully submitted,

/s/ Elissa Jacobs

Elissa Jacobs

Senior Counsel

Special Federal Litigation Division

cc: **BY ECF**
Vik Pawar, Esq.
Counsel for Plaintiff